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UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA

1 ANIBAL RODRIGUEZ, SAL
 2 CATALDO, JULIAN
 3 SANTIAGO, and SUSAN LYNN
 4 HARVEY, individually and on behalf of all
 5 others similarly situated,

6 Plaintiffs,
 7 vs.
 8 GOOGLE LLC,
 9 Defendant.

10 Case No.: 3:20-cv-04688-RS

ADMINISTRATIVE MOTION TO CONSIDER WHETHER ANOTHER PARTY'S MATERIAL SHOULD BE SEALED

11 The Honorable Richard Seeborg
 12 Courtroom 3 – 17th Floor
 13 Date: July 25, 2024
 14 Time: 1:30 P.M.

Pursuant to Civil Local Rule 79-5, Plaintiffs respectfully ask the Court to consider whether Google LLC's ("Google") material should be sealed. The material is included within Plaintiffs' Opposition to Google's Motion for Summary Judgment.

Document Sought to be Sealed	Party Claiming Confidentiality	Portions to be filed under seal	Basis for Sealing Portion of Document
Plaintiffs' Opposition to Google's Motion for Summary Judgment	Google	Portions highlighted in yellow	Refers to material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" by Google pursuant to the Protective Order
Exhibit 1 to the Declaration of Mark Mao ISO Plaintiffs' Opposition to Google's Motion for Summary Judgment ("Mao Decl.")	Google	Entirety	Material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" by Google pursuant to the Protective Order
Mao Declaration Ex. 2	Google	Entirety	Material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" by Google pursuant to the Protective Order
Mao Declaration Ex. 3	Google	Entirety	Material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" by Google pursuant to the Protective Order
Mao Declaration Ex. 4	Google	Entirety	Refers throughout to material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" by Google pursuant to the Protective Order
Mao Declaration Ex. 5	Google	Entirety	Material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" by Google pursuant to the Protective Order

1	Mao Declaration Ex. 6	Google	Entirety	Material designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” by Google pursuant to the Protective Order
2	Mao Declaration Ex. 33	Google	Entirety	Material designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” by Google pursuant to the Protective Order
3	Mao Declaration Ex. 34	Google	Entirety	Material designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” by Google pursuant to the Protective Order
4	Mao Declaration Ex. 37	Google	Entirety	Reflects material designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” by Google pursuant to the Protective Order
5	Mao Declaration Ex. 40	Google	Entirety	Material designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” by Google pursuant to the Protective Order
6	Mao Declaration Ex. 41	Google	Entirety	Material designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” by Google pursuant to the Protective Order
7	Mao Declaration Ex. 43	Google	Entirety	Material designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” by Google pursuant to the Protective Order
8	Mao Declaration Ex. 44	Google	Entirety	Material designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only”

1			by Google pursuant to the Protective Order	
2	Mao Declaration Ex. 45	Google	Entirety	Material designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” by Google pursuant to the Protective Order
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5	Mao Declaration Ex. 46	Google	Entirety	Material designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” by Google pursuant to the Protective Order
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9	Mao Declaration Ex. 47	Google	Entirety	Refers to material designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” by Google pursuant to the Protective Order
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13	Mao Declaration Ex. 49	Google	Entirety	Material designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” by Google pursuant to the Protective Order
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17	Mao Declaration Ex. 50	Google	Entirety	Refers throughout to material designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” by Google pursuant to the Protective Order
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21	Mao Declaration Ex. 51	Google	Entirety	Material designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” by Google pursuant to the Protective Order
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24	Mao Declaration Ex. 56	Google	Entirety	Material designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” by Google pursuant to the Protective Order
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28	Mao Declaration Ex. 57	Google	Entirety	Material designated “Confidential” or

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17	Mao Declaration Ex. 65	Google	Entirety	Material designated “Confidential” or
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3	Mao Declaration Ex. 66	Google	Entirety	Material designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” by Google pursuant to the Protective Order
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14	Mao Declaration Ex. 69	Google	Entirety	Material designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” by Google pursuant to the Protective Order
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17	Mao Declaration Ex. 70	Google	Entirety	Material designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” by Google pursuant to the Protective Order
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21	Mao Declaration Ex. 71	Google	Entirety	Material designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” by Google pursuant to the Protective Order
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24	Mao Declaration Ex. 72	Google	Entirety	Material designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” by Google pursuant to the Protective Order
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Pursuant to Civil Local Rule 79-5(f), Google, as the Designating Party, bears the responsibility to establish that its designated material is sealable.

Dated: May 2, 2024

Respectfully submitted,

By: /s/ Mark Mao

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